

# EXHIBIT J

Vladimir Iakovlev, M.D.

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
3                   AT CHARLESTON

4  
5   IN RE: ETHICON, INC.,                   Master File No.  
6   PELVIC REPAIR SYSTEM PRODUCTS       2:12-MD-02327  
7   LIABILITY LITIGATION                 MDL 2327

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9   THIS DOCUMENT RELATES TO CASE  
10  CONSOLIDATION:  
11  Terreski Mullins, et al., v.  
12  Ethicon, Inc., et al.  
13  Case No. 2:12-CV-02952

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17                   DEPOSITION OF  
18                   VLADIMIR IAKOVLEV, M.D.

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21                   HIGHLY CONFIDENTIAL PORTION

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24                   September 11, 2015

25                   9:00 a.m. - 5:05 p.m.

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1 as far as I remember was up to seven, probably just  
2 over seven microns thick.

3 And I think it was a hernia mesh and  
4 for hernia meshes, when they've been in the body  
5 for like 12 or 14 years, it's very difficult to  
6 trace what type of mesh was put in.

7 Q. Your best recollection insofar as  
8 you're dealing with Prolene mesh for the treatment  
9 of stress urinary incontinence, the largest you've  
10 seen is five microns, correct?

11 MR. ORENT: Objection.

12 THE WITNESS: Probably six, I don't  
13 remember now.

14 BY MR. THOMAS:

15 Q. This bark, as you've described it,  
16 by definition is cracking?

17 A. Yes.

18 Q. And when you get past the bark  
19 layer the interior of the polypropylene as best as  
20 you can tell is unaffected?

21 A. Yes.

22 Q. Okay.

23 A. The core of the fibers remains, at  
24 least, the same by my methods.

25 Q. And by your methods, as far as you

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1 can tell, past the five microns or so, the physical  
2 properties of the polypropylene remain the same,  
3 true?

4 MR. ORENT: Objection.

5 THE WITNESS: By my methods, yes.

6 BY MR. THOMAS:

7 Q. Have you described -- you've  
8 described two ways that you believe that mesh  
9 becomes stiff.

10 Are there any other ways that you  
11 believe mesh becomes stiff in the body?

12 A. Three. So multi layering, scar  
13 encapsulation and then degradation. No, I don't  
14 know any other mechanism for stiffening.

15 Q. And the way that you're able to  
16 identify multi layering is when you analyze the  
17 mesh after it's been sent to you in formalin from  
18 the surgeon, correct?

19 A. As I said, sometimes I receive  
20 meshes fresh in saline or not just -- and I see  
21 it's folded already.

22 Q. The only polypropylene meshes that  
23 you've given us, other than the one that you've  
24 given us limited information about, come to you in  
25 formalin, correct?

1 CERTIFICATE OF REPORTER

2 CANADA )

3 PROVINCE OF ONTARIO )

4

5 I, Judith M. Caputo, the officer before whom the  
6 foregoing deposition was taken, do hereby certify  
7 that the witness whose testimony appears in the  
8 foregoing deposition was duly sworn by me; that the  
9 testimony of said witness was taken by me in  
10 shorthand, using Computer Aided Realtime, to the  
11 best of my ability and thereafter reduced to  
12 written format under my direction; that I am  
13 neither counsel for, related to, nor employed by  
14 any of the parties to the action in which the  
15 deposition was taken, and further that I am not  
16 related or any employee of any attorney or counsel  
17 employed by the parties thereto, nor financially or  
18 otherwise interested in the outcome of the action.

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22 Judith M. Caputo, RPR, CSR, CRR

23

24 Commissioner for taking

25 Oaths in the Province of Ontario